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11 **UNITED STATES DISTRICT COURT**
12 **FOR THE DISTRICT OF NEVADA**
13

14 UNITED STATES OF AMERICA,

15 Plaintiff,

16 vs.

17 MIGUEL CASTRO, ET AL,

18 Defendant.

19 CASE NO: 2:19-cr-00295-GMN-NJK

20 **STIPULATION TO MODIFY PRE-
21 TRIAL RELEASE CONDITIONS TO
22 ALLOW INTERSTATE TRAVEL**

23
24 IT IS HEREBY STIPULATED AND AGREED, by and between Nicholas A.
25 Trutanich, United States Attorney, and Timothy Taesong Finley, Trial Attorney for U.S.
26 Department of Justice – Consumer Protection Branch, counsel for the United States of
27 America, and Yi Lin Zheng, Esq., counsel for Miguel Castro, that defendant Miguel Castro be
28 allowed to travel interstate between Nevada and California for the purposes of being able to
assist his daughter in moving her residence in Los Angeles, California because she became the
victim of harassment and possible victim of a crime. The parties would respectfully request
that the Court grant the parties stipulation to modify this specific condition of Defendant's
release.

1 **IT IS HEREBY STIPULATED AND AGREED UPON**, by and between the parties
2 hereto, that the geographical restriction of Defendant's release conditions shall be modified to
3 allow Defendant to travel between Nevada and California, on Saturday, July 11, 2020 and to
4 return to Nevada on or before Sunday, July 12, 2020, provided that Defendant gives notice to
5 his Pre-Trial Services Officer prior to travel and notice upon return. Further, Defendant's Pre-
6 Trial Services Officer reports that his is currently in good standing and has no opposition to
7 the request to travel interstate.
8

9 STIPULATION entered by:
10

11 _____/s/_____
12 YI LIN ZHENG, ESQ.
13 Nevada Bar No. 10811
14 530 S. Seventh St.
15 Las Vegas, Nevada 89101
16 Attorney for the Defendant
17 MIGUEL CASTRO

18 STIPULATION entered by:
19

20 _____/s/_____
21 NICHOLAS A. TRUTANICH
22 United States Attorney
23 TIMOTHY FINLEY, Trial Attorney
24 U.S. Department of Justice
25 Consumer Protection Branch
26 PO Box 386
27 Washington, DC 20044
28

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

VS.

MIGUEL CASTRO, ET AL.,

Defendant.

CASE NO: 2:19-cr-00295-GMN-NJK

ORDER TO MODIFY PRE-TRIAL RELEASE CONDITIONS TO ALLOW INTERSTATE TRAVEL

Upon Stipulation of the parties:

IT IS HEREBY ORDERED that the geographical restriction of Defendant's release conditions shall be modified to allow Defendant to travel between Nevada and California, on Saturday, July 11, 2020 and to return to Nevada on or before Sunday, July 12, 2020, provided that Defendant gives notice to his Pre-Trial Services Officer prior to travel and notice upon return.

DATED this 8th day of July, 2020.

UNITED STATES MAGISTRATE JUDGE